

U.S. Department of Justice

*United States Attorney
Southern District of New York*

BY ECF

The Honorable Andrew L. Carter, Jr.
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2203
New York, NY 10007

86 Chambers Street
New York, New York 10007

January 7, 2025

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 01/07/2025

Re: *Knight First Amendment Institute v. U.S. Dep't of Homeland Security et al.*,
No. 17 Civ. 7572 (ALC)

Dear Judge Carter:

I represent Defendants (the “government”) in the above-referenced FOIA action and write respectfully on behalf of all parties in the above-referenced FOIA action to provide a status update.

Since the last status report, Plaintiff has reviewed all of the draft Vaughn indexes provided by the government and determined that it will not raise any additional challenges to the government’s asserted FOIA exemptions. Therefore, the only remaining issue is attorneys’ fees and costs. Plaintiff is now preparing a demand and supporting documentation for the government’s consideration. To allow the parties to discuss a potential resolution of this issue without the Court’s intervention, the parties respectfully propose to file a further status update by March 10, 2025.

I thank the Court for its attention to this matter.

Respectfully,

EDWARD Y. KIM
Acting United States Attorney

By: /s/ Peter Aronoff
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SO ORDERED:
Andrew L. Carter, Jr.

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

January 7, 2025
New York, NY

cc: Counsel for Plaintiff (by ECF)